

60674

**EPA Response  
Second Inquiry**

**May, 1989**

## EPA RESPONSE

1. a) Whitehall Laboratories is an over-the-counter (OTC) pharmaceutical company that specializes in the following principle areas:

Analgesics	Topical Anesthetics
Nutritional Supplements	Sleeping Aids
Antacids	Asthma Remedies
Cold Products	Hemorrhoidal Remedies
Family Planning	Personal Care Products

b) Whitehall Laboratories manufactures pharmaceutical and health care products in tablet, liquid, cream, lotion, and suppository form. Production processes at the plant involve batch mixing and formulation of products from purchased raw materials. No synthetic production processes are in use at the facility. The batch processes occur in tanks and similar vessels, with the formulated tablet products pressed in tablet presses. Once the products are formulated and pressed, packaging of these materials occurs in bottle filling, and blister packaging equipment.

c) The waste materials that have been sent to Himco and Himco Waste-Away, Inc. are:

- Cafeteria waste
- Office waste
- Corrugated waste
- Off specification finished product from packaging lines and returned goods.
- Dust from dust collection units that provide air pollution control on product production equipment.
- Empty drums.

d) All non-hazardous waste is disposed of via Himco Waste Away. Corrugated waste is sent to Central Bailing for recycling. Empty drums are sent to Krook Container Company for recycling. Hazardous waste is disposed of via a licensed hazardous waste disposer as per 2.a) below.

e) SIC #2834

2. a) Chem Care; 3416 South Post Road; Indianapolis, IN 46239  
Triangle Resource Industries; Old Greenbrier Pike; Greenbrier, IN 37073  
VanWaters & Rogers; 59865 Market Street; South Bend, IN 46614

b) Bruce D. Jones, Assistant Plant Manager

3. Yes.

4. Monthly statement and pick-up receipts from 1/1/81 through 12/31/88.  
Service agreements for 1988 and 1989. (see Appendix A)

5. The waste that has been disposed at Himco, Inc. or Himco Waste-Away, Inc. include a combination of:

- a. Finished product (off specification and return goods);
- b. Bottles (glass and plastic);
- c. Bottle Caps (metal and plastic);
- d. Paper (labels, cartons, brochures);
- e. Powder from dust collection units
- f. Cardboard
- g. Scrap metal, wood, and plastic;
- h. Maintenance scrap (wood, metal, etc.)

5. Continued.....

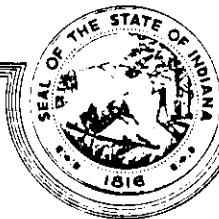
Prior to disposition of production materials, they are processed through a shredder to ensure that they are unusable and thus could not be scavenged from the landfill.

The character of the waste is a solid, with the waste compacted on-site prior to its disposal.

6. A listing of waste sent to Himco Waste Way from December, 1980 through December, 1988, is attached (Appendix B). No records were found for disposal activities prior to December, 1980.
7. A copy of Material Safety Data Sheets for materials that may be in the waste destined for Himco is contained in Appendix D. These MSD sheets are for the raw materials that are used in production of our products. The materials are consumed through use in our manufacturing processes, and are not disposed in their raw material form. The presence in the waste will only be in the off-specification product and returned goods that are disposed in the trash compacting system. Copies of the analyses performed on the waste are attached in Appendix C.
8. Whitehall Laboratories has been covered by general liability insurance since the facility was built in 1948. While the policies indicate that coverage will be limited to cases of sudden and accidental discharge of hazardous material, the exact meaning of these terms has traditionally been unclear and therefore it is impossible to predict with any degree of accuracy the precise boundaries of the coverage.

# STATE OF INDIANA

STATE BOARD OF HEALTH  
AN EQUAL OPPORTUNITY EMPLOYER



## INDIANAPOLIS

Address Reply to:  
Indiana State Board of Health  
1330 West Michigan Street  
Indianapolis, IN 46206

June 11, 1976

Mr. Paul Brandt, Plant Manager  
Whitehall Laboratories  
1919 Superior Street  
Elkhart, Indiana 46514

JUN 16 1976

Dear Mr. Brandt:

Re: Pharmaceutical Waste Disposal  
Elkhart County

This will confirm your telephone conversation of June 9, 1976, with George Oliver of this office concerning the identification of pharmaceutical waste currently being landfilled. As discussed by requesting a qualitative and quantitative analysis, we are interested in the names of the chemical compounds and the quantities of each. With this information we will be able to evaluate the inherent dangers involved in their handling and disposal.

Although this office did not specifically grant additional time, we will agree to a time extension until July 1, 1976.

We hope this will clarify our request for pharmaceutical information. If you have any questions contact this office at AC 317/633-6400.

Very truly yours,

David D. Lamm, Acting Chief  
Solid Waste Management Section  
Division of Sanitary Engineering

GO/mb

cc: Mr. Chuck Himes  
Elkhart County Health Department  
Elkhart County Commissioners

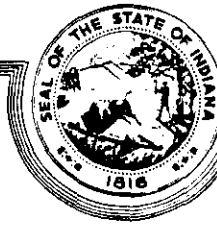
cc A. Weaver

6/14

cc. Marnell  
Amko

5/12/77

# STATE OF INDIANA



## INDIANAPOLIS

STATE BOARD OF HEALTH  
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:  
Indiana State Board of Health  
1330 West Michigan Street  
Indianapolis, IN 46206

September 24, 1976

SEP 23 1976

Mr. Charles H. Himes, Jr.  
Earthmovers, Inc.  
707 North Wildwood Avenue  
Elkhart, Indiana 46514

Dear Mr. Himes:

Re: Disposal of Medical Waste  
Earthmovers, Inc., Elkhart County

We have no objection to the landfilling of pharmaceutical waste products from Whitehall Laboratories, Inc., and Miles Laboratories, Inc., at the Earthmovers, Inc., Landfill located at C.R. 26 and C.R.9. A list of the materials is on file with the Solid Waste Management Section.

The waste is to be mixed with the general refuse and covered with at least 6 inches of soil by the end of each working day. Any increase in volume or additions to the lists submitted by the companies is to be reported to the Solid Waste Management Section.

If you have any questions, please contact Mr. George Oliver or Mr. Guinn Doyle of the Solid Waste Management Section at AC 317/633-6400.

Very truly yours,

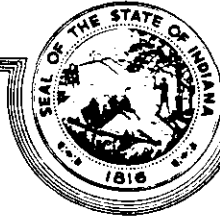
Roland P. Dove, Director  
Division of Sanitary Engineering

GPJ/sjk

cc: Elkhart County Health Department  
Elkhart County Commissioners  
Whitehall Laboratories  
Miles Laboratories

cc A. Weaver  
M. Cohen  
9/28/76

# STATE OF INDIANA



## INDIANAPOLIS

STATE BOARD OF HEALTH  
AN EQUAL OPPORTUNITY EMPLOYER

Address Reply to:  
Indiana State Board of Health  
1330 West Michigan Street  
Indianapolis, IN 46206

January 14, 1977

JAN 14 1977

Mr. Herman Runfelt  
R. R. 6, Box 377  
28369 C.R. 10 West  
Elkhart, Indiana 46514

Dear Mr. Runfelt:

Re: Pharmaceutical Waste Investigation  
Elkhart County

We wish to inform you that we have completed our investigation concerning the types and quantities of pharmaceutical wastes deposited at the Himco disposal site on C.R. 10 and the Mappanee by-pass.

The review by our staff, of the information submitted, has concluded that these wastes should not be considered toxic or hazardous for land-fill disposal in the quantities indicated.

If there are any questions, please feel free to contact this office.

Very truly yours,

David D. Lamm, Acting Chief  
Solid Waste Management Section  
Division of Sanitary Engineering  
AC 317/633-6400

GO/sjk

cc: Elkhart County Health Department  
Elkhart County Commissioners

bcc: Mr. E. E. Hartgerink  
Mr. Charles Himes  
Mr. Paul F. Brandt

cc. M. Cohen  
✓ A. Weaver  
1/14/77

7/19

June 30, 1976

David D. Lamm, Acting Chief  
Solid Waste Management Section  
Division of Sanitary Engineering  
Indiana State Board of Health  
1330 West Michigan Street  
Indianapolis, Indiana 46206

Dear Mr. Lamm:

SUBJECT: Pharmaceutical Waste Disposal - Elkhart County

Further to your June 11, 1976 letter, I am attaching a listing of the chemicals and quantities that we dispose of via Himco Waste Away Service. These figures are average daily figures based on a 10-day test period.

Thank you for allowing us the time extension. Should you have any questions, please call.

Very truly yours,

WHITEHALL LABORATORIES INC.

Paul F. Brandt  
Assistant Vice President

sem

Att.

bcc: Mr. C. Himes, Himco - Elkhart  
A. Weaver - Whitehall, NY

Art: Mr. Lamm's 6/11 letter was also sent to the Elkhart County Health Department and Elkhart County Commissioners. I did not provide either a copy of my letter, however, if you feel they should receive a copy, I will send one to each.

PFB

cc Merrill  
Anho

Whitehall Laboratories  
Elkhart, Indiana

Aspirin	504.55 lbs.	Phenylephrine HCl	.315 lbs.
Caffeine	151.99 lbs.	Phenindamine Tartrate	.64 lbs.
Calcium Carbonate	17.67 lbs.	FMA-11	40.51 lbs.
✓ Magnesium Hydroxide	16.59 lbs.	Theophylline Hydrous	1.59 lbs.
Ephedrine Hydrochloride	.30 lbs.	Methapyrilene Hydrochloride	.23 lbs.
Phenobarbital	.09 lbs.	Sodium Bicarbonate	4.14 lbs.
✓ Magnesium Carbonate	3.06 lbs.	Starch	196.90 lbs.
Sterotex	1.79 lbs.	Di-Pac	1.41 lbs.
Calcium Stearate	.02 lbs.	Sodium Saccharin	.01 lbs.
Lactose	1.29 lbs.	Peppermint Oil	.04 lbs.
Acetaminophen	15.65 lbs.	Pamabron	.054 lbs.
Sodium Lauryl Sulfate	.07 lbs.	Dried Aluminum Hydroxide Gel	.12 lbs.
Sodium Carboxymethylcellulose	.39 lbs.	Propyl Parabin	.032 lbs.
Triethanolamine	.34 lbs.	Stearic Acid	3.84 lbs.
Cetyl Alcohol	2.02 lbs.	Methyl Nicotinate	.26 lbs.
Oleoresin Capsicum	.04 lbs.	Histamine Dihydrochloride	.03 lbs.
Methyl Parabin	.01 lbs.	Oil of Lavender	.26 lbs.
Live Yeast Cell Derivative	.59 lbs.	Shark Liver Oil	.296 lbs.
Phenylmercuric Nitrate	.003 lbs.	Scopolamine Hydrobromide	.001 lbs.
Salicylic Acid	1.45 lbs.	Methol Levo	.569 lbs.
Acetic Acid	1.13 lbs.	Camphor	.268 lbs.
Castor Oil	.23 lbs.	Acetone	1.68 lbs.
Ether	4.87 lbs.	Netrocellulose Blend	.571 lbs.
- Chalk	2.83 lbs.	Thioglycolic Acid	2.54 lbs.
Calcium Hydroxide	1.42 lbs.	Sodium Silicate	1.024 lbs.
Sodium Hydroxide	1.23 lbs.	Perfume Oils	.672 lbs.
Lemon Fragrance	.01 lbs.	Iron Oxide	.004 lbs.
Simethon	.01 lbs.	Mineral Oil	1.479 lbs.
Promulgen	.92 lbs.	Sorbital	.799 lbs.
Paraffin	.27 lbs.		
Chloroform	.10 gal.	Methyl Salicylate	.07 gal.
Alcohol SD-23A	.19 gal.	Coal Tar	.22 gal.
Parachlorometaxylenol	.01 gal.	Maprofix	1.30 gal.
Methocel	.03 gal.	Supermide	.10 gal.
Iodine	.001 gal.	Glycerine	.50 gal.
Alcohol 38A	.37 gal.	Benzocaine	.03 gal.

ce Marnell  
Anko

3/2/77

6/30/76

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

FILE UNDER: PRODUCTS

APR 24 1989

SUBJECT: REVISED LISTING

TO: H. DEVINE -NY  
J. JESTER -E  
F. REAVES -H  
H. LEE -FP

M. ROBERSON -D  
D. HALE -K  
S. GONZALEZ -LA  
S. HIRCKO -R  
W. HEILBRON -HO

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
ADVIL TABLETS	5/18/84	
ADVIL CAPLETS	8/18/86	
ANACIN TABLETS	2/30	
ANACIN CAPSULES	10/01/80	12/01/86
ANACIN CAPLETS	12/01/85	
ANACIN POWDER	5/70	8/01/73
ANACIN SELTZER	6/70	1/27/72
ANACIN RUB	7/01/74	1/13/77
MSA TABS	3/21/79	
MSA CAPSULES	3/03/80	12/01/86
ASPIRIN FREE ANACIN-3 TABS	5/10/77	11/82
ASPIRIN FREE ANACIN -3 CAPSULES	5/18/81	11/82
REGULAR STRENGTH ANACIN-3 (325 MG) TABLETS	7/12/82	
MAXIMUM STRENGTH ANACIN -3 (500 MG) TABLETS	11/82	
MAXIMUM STRENGTH ANACIN-3 (500 MG) CAPSULES	11/82	12/01/86
MAXIMUM STRENGTH ANACIN-3 CAPLETS	8/19/85	
ANBESOL LIQUID	10/30/64	
MAXIMUM STRENGTH ANBESOL LIQUID	10/05/87	

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
ANBESOL GEL	3/26/79	
MAXIMUM STRENGTH ANBESOL GEL	10/05/87	
BABY ANBESOL GEL	5/14/84	
AQUAFILTER	10/01/64	12/13/65
ARMED	10/05/66	8/26/69
ARTHRITIS PAIN FORMULA TABLETS	8/19/68	10/28/85
ARTHRITIS PAIN FORMULA CAPLETS	10/28/85	
APF-ASPRIN FREE TABLETS	9/24/73	11/15/74
ASPRIRIN FREE APF TABLETS	10/15/81	
SAFETY COATED APF TABLETS	10/03/83	7/18/86
BEMINAL 500	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
BEMINAL FORTE	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	4/03/89
BEMINAL STRESS PLUS W/IRON	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	10/04/88
BEMINAL STRESS PLUS W/ZINC	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	10/04/88
BENEFAX	10/13/53	11/21/57
BISODOL CHLOR MINTS	1/52	1/12/59
BISODOL LIQUID ANTACID	1/05/67	10/68
BISODOL PLUS (FORMERLY ROLL TABS)	6/15/67	2/27/73

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DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE</u> (OR INTRODUCTION)	<u>DATE OF DISCONTINUANCE</u>
BISODOL PLUS WITH BELLADONNA	10/70	3/13/72
BISODOL POWDER	12/01/27	
BISODOL ROLL TABLETS	10/01/64	5/18/67
BISODOL TABLETS	1938 1952	
BIOLOTION	2/09/54	10/04/57
BRONITIN MIST	7/68	
BRONITIN TABS	2/17/60	
BUFFERED ASPIRIN	1/14/55	10/20/58
BUFFERED ASPIRIN	8/03/56	5/29/57
CAROL CUSHING FACE CREAM	7/11/55	8/24/57
CHILDREN'S ANACIN	1/01/61	9/28/71
CHILDREN'S ANACIN-3 ELIXIR/LIQUID	12/01/82	
CHILDREN'S ANACIN-3 TABLETS	12/01/82	
INFANT'S ANACIN-3 DROPS	12/01/82	
CHOCOLAX	10/24/66	8/24/67
CLEARBLUE PREGNANCY TEST	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	
CLEARBLUE EASY SINGLE TEST	8/29/88	
CLEARBLUE EASY DOUBLE TEST	8/29/88	
CLEAR & DRY TABLETS	9/69	4/17/74
CLEANSING PADS (FORMERLY PREP H PADS)	5/75	
CLEARPLAN OVULATION PREDICTOR	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
CLUSIVOL CAPSULES	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
CLUSIVOL TABS	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	10/04/88
CLUSIVOL SYRUP	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERT)	
COMPOUND W LIQUID	3/15/55	
COMPOUND W GEL	3/10/83	
CONCERN FEMININE HYGIENE SPRAY	2/01/69	11/27/72
CONCERN CONCEPTION CONTROL COMPOUND	9/01/73	8/25/75
CONQUEST	9/12/66	12/31/69
CUMULUN	4/17/67	1/07/71
DENALAN ADHESIVE	7/12/71	10/26/72
DENALAN POWDER	1/23/63	
DENALAN TABLETS	1/70	11/30/72
DENOREX MEDICATED SHAMPOO LIQUID	5/01/72	
DENOREX MEDICATED SHAMPOO GEL	5/01/72	9/26/86
DENOREX MOUNTAIN FRESH LIQUID	5/01/78	
DENOREX MOUNTAIN FRESH HERBAL LOTION	1/02/80	
DENOREX WITH CONDITIONERS LOTION	1/01/81	
DENOREX EXTRA STRENGTH FORMULA	10/05/87	

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
DERMOPLAST LOTION	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
DERMOPLAST SPRAY	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
DIET GARD VITAMINS TABLETS	6/01/80	5/07/81
DIET GARD 14-DAY DIET PLAN CAPSULES & TABLETS	6/15/81	3/06/84
DIGENE	7/01/59	8/03/66
DIREXIN CREAM	1/01/61	6/09/65
DIREXIN ROLL-IN	9/07/61	6/25/65
DIREXIN TABLETS	8/18/64	3/06/68
DONDRIL	10/01/56	
DRIAL NASAL SPRAY (MIST)	11/23/55	7/19/69
DRIAL TABLETS	7/28/65	5/31/73
DRISTAN CAPLETS	8/18/86	
DRISTAN CAPSULES	1/04/65	12/01/86
DRISTAN CAPSULES NEW FORMULA	12/01/80	12/01/86
DRISTAN ASPIRIN-FREE TABLETS	11/03/76	
DRISTAN COUGH FORMULA	9/01/60	9/10/86
DRISTAN HOT BEDTIME	1/28/74	10/28/77
DRISTAN INHALER	8/01/58	11/03/88
DRISTAN MAXIMUM STRENGTH CAPLETS	7/05/88	
DRISTAN NASAL MIST	2/03/58	

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

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DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
DRISTAN NASAL SPRAY PUMP	7/01/88	
DRISTAN LONG LASTING NASAL SPRAY PUMP	7/01/88	
DRISTAN NIGHTTIME LIQUID	1/14/74	12/23/75
DRISTAN NIGHTTIME TABLETS	2/05/79	9/18/81
DRISTAN MIST - CHILDREN	7/01/68	5/12/71
DRISTAN NOSE DROPS	2/18/63	7/23/64
DRISTAN DECONGETS	11/01/65	3/08/68
DRISTAN LONG LASTING NASAL MIST/VAPOR NASAL MIST	6/21/76	
DRISTAN LONG LASTING CHILDREN	2/07/77	9/12/78
DRISTAN SNIFFLES & FEVER RELIEVER	12/27/68	5/12/70
DRISTAN SOLID STICK	1/14/74	4/19/77
DRISTAN THROAT SPRAY	9/11/67	6/23/69
DRISTAN SORE THROAT GARGLE	9/15/77	1978
DRISTAN VAPOR SPRAY	1/01/71	1976
DRISTAN ROOM VAPORIZER	12/28/62	
DRISTAN TABLETS	1/01/56	
DRISTAN ULTRA COLDS FORMULA TABS	7/12/82	10/29/86
DRISTAN ULTRA COLDS FORMULA LIQUID	7/12/82	11/19/85
DRISTAN ULTRA COLDS FORMULA CAPS	7/12/82	8/13/86
DRISTETS	10/15/62	10/14/63

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<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
DRY GARD	4/14/69	9/24/71
DRY & CLEAR LOTION (FORMERLY CLEAR & DRY)	10/13/75	
DRY & CLEAR CLEANSER	4/17/78	3/29/85
DRY & CLEAR EXTRA STRENGTH CREAM	10/23/78	3/07/79
DRY & CLEAR DOUBLE STRENGTH 10% CREAM	3/05/79	
DUALIN	3/15/65	5/22/67
DUPLEXIN	9/13/54	4/17/74
DURAGARD	11/19/63	10/15/65
EMARDON EAR WAX REMOVER	6/21/71	11/26/73
EMBER ANALGESIC STICK	7/02/56	4/27/59
EMPATHOL MENOPAUSE CALMATIVE	10/11/71	2/27/73
END-CHAFE	8/30/76	3/22/78
ENZACTIN	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
EVIDENCE	9/05/78	3/09/84
EXTRANOL (NOW EXTRAMED)	2/19/76	4/08/76
EXTRAMED	5/04/76	5/24/79
FIBER GUARD	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
FIBRASIN BRAN TABLETS	6/11/79	1980
FLITE	7/29/68	2/01/71
FREEZONE	2/04/26	
GARDRIN ANTACID TABLETS	9/11/78	1979

WHITEHALL LABORATORIES  
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FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE</u> (OR INTRODUCTION)	<u>DATE OF DISCONTINUANCE</u>
GUARDS COLD TABLETS	1/09/50	1/12/59
GUARDS SWABS	2/23/65	10/27/66
HEATHER ROUGE	1927 (ACQ'D BY WHITEHALL 1/01/48 FROM AFFIL. PRODS)	4/19/76
HEATHER SPRAY	5/24/71	
HEET LINIMENT	1/01/29	
HEET SPRAY	1/01/68	
HEET GEL	7/06/71	5/07/74
HEET STICK	3/19/58	4/27/59
HILL'S COLD TABS	2/04/26	9/02/69
HOPE DENTURE CLEANSER	7/17/50	7/13/55
HOPE DENTURE POWDER	7/17/50	7/19/60
HOPPERS CLAY PACK (NOW SUDDEN BEAUTY AIR MASK)	1936 (ACQ'D BY WHITEHALL 1/01/48)	5/57
IMPETINE OINTMENT	9/05/72	11/10/75
INFRARUB FOAM AEROSOL	1/02/74	12/03/76
INFRARUB CREAM	12/01/53	
INSTANT ANACIN	7/20/56	10/04/57
INSTANT BISODOL POWDER	1/04/57	10/04/57
INSTIL	9/01/58	2/21/61
JEL-AID	3/14/77	9/12/78
JO-CUR	1936 (ACQ'D BY WHITEHALL 1/01/48 FROM AFFIL. PRODS)	1982
KERODEX 51 (DRY)	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	

WHITEHALL LABORATORIES  
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FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
KERODEX 71 (WET)	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
KOLYNOS CHLOR	12/24/58	8/09/65
KOLYNOS - FLUORIDE	5/24/56	5/13/59
KOLYNOS - FLUORIDE (RE-INSTANTMENT)	7/01/62	10/70
KOLYNOS - SUPER WHITE	1/12/28	
KRIPTIN	11/01/49	1/14/81
LARYLGAN	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
LAXATIVE H	9/24/73	10/28/77
LIP GARD	9/01/60	3/07/73
LITEMED TABLETS	3/02/81	1981
MSB	10/19/65	2/10/67
MEDIBLE	9/15/61	12/07/64
MELCALOSE	6/12/50	12/07/60
MICRO-ACTIVE ASPIRIN TABLETS	8/15/72	11/10/75
MILKOTE	4/64	6/21/67
MOMENTIN	2/01/66	2/09/68
MOMENTUM MUSCULAR BACKACHE FORMULA TABS	8/31/73	10/01/86
MOMENTUM MUSCULAR BACHACHE FORMULA CAPS	10/01/86	
MR. MED	10/01/64	12/07/66
MEDITHANE OINTMENT & SUPPOSITORIES	11/09/64	7/16/68
NEEDOL	11/21/56	1/07/59

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
NEET CREAM & LOTION LEMON	4/01/74	
NEET CREAM FLORAL (ROSE)	1936 (ACQ'D BY WHITEHALL 1/1/48 FROM AFFIL. PRODS)	
NEET LOTION FLORAL (ROSE)	3/13/54	
NEET AEROSOL-FLORAL (ROSE)	8/70	9/21/83
NEET AEROSOL - LEMON	3/73	10/05/83
NEET CREAM - HERBAL	5/01/78	1/16/85
NEET LOTION - HERBAL	5/01/78	2/01/88
NEET CREAM - W/COCOA BUTTER	1/04/82	
NEET LOTION - W/COCOA BUTTER	1/15/81	
NEET CREAM - W/ALOE VERA	2/11/84	
NEET LOTION - W/ALOE VERA	2/11/84	
NEET BIKINI LINE KIT REGULAR	1/09/84	
NEET BIKINI LINE KIT W/ALOE VERA	2/10/86	
NEET ROLL-ON	2/27/89	
NEET SHAVE CREAM	1/03/83	4/22/86
OUTGRO	2/04/26	
OXIPOR VHC LOTION	9/28/70	
PAINQUILLIZER	10/18/60	10/23/64
PERIODIC PAIN FORMULA	10/04/71	8/01/73

WHITEHALL LABORATORIES  
WAREHOUSE BULLETIN 3880-11

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FROM: ROSALIE MESCALL  
DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE</u> (OR INTRODUCTION)	<u>DATE OF DISCONTINUANCE</u>
PETROSYLLIUM	1939	10/31/83
PET-UP & GO	8/15/66	11/70
POSTURE TABS	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
POSTURE -D TABS	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
POWERIN	9/12/66	7/20/72
PRANDIUM	1/11/63	7/12/65
PREDICTOR	7/24/78	9/11/86
PREDICTOR - REFILL	11/15/79	9/11/86
PRE-EMPTIN	11/16/64	10/27/66
PREPARATION H CREAM	7/05/88	
PREPARATION H TOWELETES	5/25/87	2/08/88
PREPARATION H LAXATIVE	9/01/61	10/69
PREPARATION H PADS (NOW CLEANSING PADS)	2/10/66	7/18/75
PREPARATION OINTMENT	1/01/52	
PREPARATION H NON-LAXATIVE REGULATOR (FORMERLY STOOL SOFTNER)	7/69	9/16/77
PREPARATION SUPPOSITORIES	1/01/54	
PREPARATION H STOOL SOFTNER (CHANGED TO PREP.H REGULATOR)	1969	1969
PREPCORT HYDROCORTISONE CREAM	3/03/81	4/29/87
PRIMATENE MIST	10/21/63	
PRIMATENE SYRUP	4/01/70	7/13/73
PRIMATENE TABLETS "P"	1/01/54	

WHITEHALL LABORATORIES  
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<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
PRIMATENE TABLETS "M"	1/01/67	
PRIMATENE TABLETS NON - SEDATIVE (DALLAS ONLY)	5/22/84	
PRIMATENE "PLUS" CAPS	4/03/72	4/17/74
PRINCESS EVE CHLORA STICK	2/01/52	9/07/56
PSOREX	6/58	6/23/70
QUIET WORLD	3/01/67	
RES DAN	4/08/58	11/23/70
RIOPAN SINGLE ROLL PACK TRIPLE ROLL PACK CHEW TABS SWALLOW TABS SUSPENSION (LIQUID)	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
RIOPAN PLUS SINGLE ROLL PACK TRIPLE ROLL PACK CHEW TABS SUSPENSION (LIQUID)	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
RIOPAN PLUS -2 CHEW TABS SUSPENSION (LIQUID)	11/01/87 (ACQ'D BY WHITEHALL 11/01/87 FROM AYERST)	
SALOXIUM	6/26/72	1/14/81
SEMICID SUPPOSITORIES	7/17/78	
SEQUENCIN	9/15/69	4/05/71
SINUS HEADACHE FORMULA	4/10/72	1/14/75
SINUS PAIN FORMULA	3/15/76	2/01/77
SINUS PAIN FORMULA EXTRA STRENGTH	1/29/79	8/14/80
SLEEP-EZE TABLETS	10/01/59	6/82
SLEEP-EZE 3 TABLETS	8/01/82	
SLEEP-EZE CAPSULES	2/28/69	5/12/71

WHITEHALL LABORATORIES  
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SLEEP-EZE ELIXIR	1/20/65	12/16/66
SOOTHOL TABLETS	12/01/55	10/23/64
SOOTHOL WAFERS	12/01/55	3/28/62
SPERTI COSMETICS	6/01/53	6/06/66
SPERTI HEALING CREAM	6/16/61	6/06/66
SPERTI OINTMENT	6/01/52	
STAR WHITE TOOTHPASTE	8/24/67	8/26/69
STRIP-EASE LIQUID	9/21/62	8/04/72
STRIP-EASE AEROSOL	9/63	8/05/71
SUBSTANCE D	5/04/56	1/07/59
SUDDEN ACTION	5/15/67	12/28/88
SUDDEN BEAUTY DEODORANT	1/19/65	3/21/69
SUDDEN BEAUTY FACIAL	5/10/57 (FORMERLY HOPPERS CLAY PACK)	1/07/75
SUDDEN BEAUTY SETTING FOAM	4/01/69	9/24/71
SUDDEN BEAUTY COUNTRY AIR MASK	2/05/75 (FORMERLY SUDDEN BEAUTY FACIAL)	12/28/88
SUDDEN BEAUTY HAIR SPRAY REGULAR	3/17/64	
SUDDEN BEAUTY HAIR SPRAY SUPERHOLD	6/01/67	
SUDDEN BEAUTY HAIR SPRAY UNSCENTED	2/68	9/24/80
SUDDEN BEAUTY HAIR SPRAY SUPER PROTEIN	5/17/71	10/19/73
SUDDEN BEAUTY HAIR SPRAY SUPER BALSAM	7/03/72	11/24/72

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SUDDEN BEAUTY HAIR SPRAY LEMON	5/01/73	7/31/73
SUDDEN BEAUTY HAIR CONTROL	7/01/75	3/08/82
SUDDEN BLUSH	5/01/67	4/08/69
SUDDEN BODY	10/04/65	12/31/69
SWINGING CLEAR	5/24/65	8/01/67
SYSTEM HAIR SPRAY CONDITIONER	6/01/71	12/13/72
THE SYSTEM	10/01/67	5/12/71
TANDY	12/28/53	10/04/57
TASSID	3/16/48	8/04/52
3B4 TABLETS	3/27/56	1/13/58
TEMPURETS CHILDREN'S ASPIRIN	9/01/67	3/69
TODAY CONDOM LUBRICATED	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	
TODAY CONDOM LUBRICATED W/SPERMICIDE	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	
TODAY CONDOM NON- LUBRICATED	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FORM VLI CORP)	
TODAY PERSONAL LUBRICANT	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	
TODAY SPONGE	1/11/88 (ACQ'D BY WHITEHALL 12/10/87 FROM VLI CORP)	
TOTAL BEAUTY AEROSOL	6/12/67	2/27/73

WHITEHALL LABORATORIES  
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DATE: APRIL 12, 1989

<u>PRODUCT</u>	<u>DATE OF FIRST SALE (OR INTRODUCTION)</u>	<u>DATE OF DISCONTINUANCE</u>
TRENDAR	5/01/59	2/01/77
TRENDAR (RE-INSTATEMENT)	5/01/78	1/31/86
TRENDAR (IBUPROFEN) TABS	6/86	
TRILIUM	10/31/66	12/29/69
TRILIUM TABLETS (RE-INSTATEMENT)	8/21/72	2/27/79
TRIPTONE	10/12/56	1/07/59
TRIPTONE (RE-INSTATEMENT)	7/03/67	7/24/68
TRIUMPH	6/23/58	12/01/60
VIROMED	10/01/61	5/26/64
VIROMED COLD TABLETS (RE-INSTATEMENT)	9/04/72	
VIROMED LIQUID	10/05/76	9/10/86
VITALESCENCE	2/27/56	1/07/59
VIZ EYE DROPS	11/09/64	12/31/69
WHITEHALL COTTON SWABS	8/01/66	12/13/70
WHITEHALL ELECTRIC TOOTHPASTE	8/01/65	4/21/66
YOUTH GARDE MOISTURIZER PLUS PABA	10/04/83	

*Rosalie Mescall*  
Rosalie Mescall

TABLE III

Summary of Raw Materials

<u>RM.</u>	<u>Raw Material</u>	<u>No. of Lots</u>	<u>Total Time</u>	<u>Av. Time/Lot</u>
0030	Acetaminophen	29	145.00	5.00
0032	Aspirin 20 Mesh	91	94.75	1.04
0034	Aspirin 20/40 Mesh	215	225.25	1.05
0078	Alcohol SD 23A	9	9.25	1.03
0084	Alcohol Phenol Menthol Camphor	17	101.00	5.94
0343	Anethole	2	10.50	5.25
0358	Anise Oil	4	7.75	1.94
0376	Antifoam AF Emulsion 30%	5	5.50	1.10
0440	Microcrystalline Cellulose	2	8.50	4.25
0513	Bentonite 670 WCD	9	19.50	2.17
0522	Benzocaine	14	55.50	3.96
0638	Bismuth Subnitrate	1	3.50	3.50
0664	Blue FDC 1	2	3.75	1.88
0685	Boric Acid	2	4.75	2.38
0800	Colloidal Silicon Dioxide	3	6.00	2.00
0811	Caffeine Anhydrous	7	28.00	4.00
0820	Caffeine Crude	11	56.00	5.09
0865	Calcium Hydroxide	14	57.75	4.13
0870	Tribasic Calcium Phosphate	1	26.00	26.00
0876	Calcium Stearate	3	25.50	8.50
0892	Camphor	11	6.00	0.55
0952	Sodium Carboxymethylcellulose	6	37.00	6.17
1106	Cetyl Alcohol	14	32.50	2.32
1111	Cetylpyridinium Chloride	2	6.25	3.13
1120	Calcium Carbonate Sturcal F	5	33.00	6.60
1129	Calcium Carbonate PPTD Light	6	43.75	7.29
1170	Chlorobutanol Anhydrous	14	53.25	3.80
1174	Chloroform	12	28.25	2.35
1190	Chlorpheniramine Maleate	7	21.25	3.04
1205	Citric Acid Hydrous	6	20.25	3.38
1208	Coal Tar Solution	15	59.25	3.95
1305	Cocoa Butter	16	38.25	2.39
1282	Clove Oil	2	4.00	2.00
1485	Dextromethorphan Hydrobromide	7	24.25	3.46
1490	Pseudoephedrine Hydrochloride	2	6.50	3.25
1502	Dibasic Calcium Phosphate Dihydrate Victor Dent	5	30.00	6.00
1503	Dibasic Calcium Phosphate Anhydrous	4	38.25	9.56
1570	DiPac (Modified Sucrose) Amstar	9	21.00	2.33
1630	Ephedrine Hydrochloride	14	33.75	2.41
1669	Ethylcellulose 10 cps	2	3.25	1.63
1672	Alcohol	11	20.00	1.82
1748	Eucalyptol	6	14.75	2.46
1760	F MA II	21	88.25	4.20
1762	Falba Pfaltz & Bauer	45	87.50	1.94
1827	Flavor 38990 Fritzsche	6	12.25	2.04
1880	Germall 115	5	10.25	2.05
1902	Glycerin 99%	3	4.75	1.58
1910	Guaifenesin	10	49.50	4.95
1911	Glycol Monosalicylate	23	58.50	2.54
2001	Histamine Dihydrochloride	12	26.50	2.21
2090	Iodine	5	17.50	3.50

III, Summary of Raw Materials, p. 2

#	Raw Material	No. of Lots	Total Time	Av. Time/Lot
21	Iron Oxide	3	4.00	0.44
2140	Isopropyl Alcohol	13	5.75	0.44
2158	Isopropyl Palmitate	2	8.75	4.38
2187	Kaolin	12	45.50	3.79
2227	Lanolin	14	55.00	3.93
2254	Lavender Oil	9	31.25	3.47
2258	Natural & Artificial Lemon Flv 13530127	3	3.75	1.25
2260	Lemon Fragrance IFF 8404-V	10	8.75	0.88
2278	Lemon Oil of Calif Cold Pressed	2	9.75	4.88
2306	Mineral Oil Kaydol	9	18.75	2.08
2347	Magnesium Carbonate Light	1	6.75	6.75
2348	Magnesium Carbonate Heavy	6	27.75	4.63
2358	Magnesium Hydroxide	7	33.00	4.71
2377	Magnesium Stearate	4	15.00	3.75
2415	Maprofix TLS-500-Onyx	5	18.50	3.70
2422	Material 'A'	1	0.50	0.50
2431	Menthol Levo	14	16.00	1.14
2489	Methapyrilene Hydrochloride	10	25.00	2.50
2493	Methocel 90 HG 15000 cps - Dow	4	16.75	4.19
2496	Methylcellulose 400 cps	1	3.25	3.25
2555	Methyl Nicotinate	7	23.25	3.32
2567	Methylparaben	3	10.00	3.33
2582	Methyl Salicylate	24	49.25	2.05
2599	Lactose	17	47.00	3.76
2605	Microcrystalline Wax	2	4.25	2.13
2612	Mineral Oil Light Carnation Sonneborn	8	9.25	1.16
2722	Oleoresin Capsicum	2	2.00	1.00
2758	Oleoresin Capsicum NLT 4%	4	20.50	5.13
2811	Pamabrom	4	11.50	2.88
2830	Parachlorometaxylenol - Ottasept Extra	6	12.00	2.00
2841	Paraffin	11	9.50	0.86
2897	Peppermint Oil Natural	5	23.75	4.75
2898	Peppermint Oil	2	11.75	5.88
2899	Peppermint Oil TRE	3	15.50	5.17
2913	Perfume IFF 578	4	2.25	0.56
2940	Perfume N-14825 Rhodia	7	3.75	0.54
2996	Petrolatum Yellow Sperti Special	12	50.75	4.23
3019	Phenindamine Tartrate	39	83.75	2.15
3021	Phenobarbital	4	19.75	4.94
3044	Phenylephrine Hydrochloride	19	49.25	2.59
3057	Phenylmercuric Nitrate	3	9.50	3.17
3119	Polyethylene Glycol 600 Dilaurate	16	44.75	2.80
3140	Potassium Alum	1	4.00	4.00
3208	Peppermint Powd Imit Lueders 2321D	9	12.75	1.42
3213	Primojel	5	26.50	5.30
3214	Promulgen Type G Robinson Wagner	11	36.50	3.32
3221	Propylparaben	7	16.00	2.29
3240	Pyrimidine Maleate	2	8.75	4.38
3343	Red DC 37 Pylam	2	1.75	0.88
3363	Red FD&C #2 Amaranth	5	20.25	4.05
3377	Red Oxide A 6205 Kohnstamm	2	7.25	3.63
342	Salicylic Acid	2	8.75	4.38
3432	Sassafras Oil	1	1.00	1.00
3445	Disodium Edetate	2	11.25	5.63
3447	Shark Liver Oil Grade A 25000 U/g	17	133.00	7.82
3456	Scopolamine Hydrobromide	5	16.75	3.35

III, Summary of Raw Materials, p. 3

<u>Raw Material</u>	<u>No. of Lots</u>	<u>Total Time</u>	<u>Av. Time/Lot</u>
352' Sodium Benzoate	2	5.50	2.75
353 Sodium Bicarbonate	1	3.00	3.00
3544 Sodium Bisulfite	1	2.25	2.25
3553 Sodium Chloride Special	13	9.00	0.69
3554 Sodium Citrate	8	19.00	2.38
3575 Sodium Hydroxide	11	23.00	2.09
3579 Sodium Hypochlorite Solution	3	4.25	1.42
3583 Sodium Lauryl Sulfate	8	61.75	7.72
3605 Sodium Peroxide	15	15.00	1.00
3614 Sodium Propionate	2	6.50	3.25
3628 Sodium Silicate	16	16.75	1.05
3656 Solka Floc BW 40	4	14.25	3.56
3661 Sorbitol Solution	18	100.50	5.58
3671 Spearmint Oil	2	2.00	1.00
3672 Spearmint Oil TRE Orbis	3	4.25	1.42
3687 SRF Concentrate Crude	12	7.50	0.63
1373 Starch	24	86.00	3.58
3692 Starch National 78-1551	7	46.75	1.06
3697 93.5% Aspirin 6.5% Starch	44	56.25	1.28
3700 Stearic Acid	15	25.75	1.72
3707 Sterotex	19	34.25	1.80
3752 Sucrose	17	44.00	2.59
3762 Superamide	7	21.50	3.07
3806 Talc WCD 141	2	7.00	3.50
3813 Tannic Acid	6	10.50	1.75
3825 Tegin 515	2	7.00	3.50
38 Theophylline Anhydrous	12	36.75	3.06
3856 Theophylline Hydrous	13	17.25	1.33
3861 Thioglycollic Acid 80%	17	73.75	4.34
3872 Thyme Oil Red	11	23.25	2.11
3908 Polysorbate 80	2	10.75	5.38
3882 Titanium Dioxide	4	60.75	15.19
3898 Triethanolamine	5	7.50	1.50
3930 Vanillin	2	4.25	2.13
3936 Veegum F Vanderbilt	4	12.25	3.06
3937 Veegum HV Grade Vanderbilt	3	7.25	2.42
3948 Viscarin TP 4 Marine Colloids	4	12.75	3.19
3951 Purified Water Deistilled, Silver Springs	2	4.50	2.25
3960 White Wax	16	29.00	1.81
3966 Witch Hazel	15	48.00	3.20
3987 Yellow FDC 5 Tartrazine	3	2.25	0.75